

Larry Fenster Senior Economist Law and Public Policy 1133 19<sup>th</sup> St., NW Washington, DC 20036 202-736-6513

June 14, 2002 Marlene Dortch Secretary Federal Communications Commission 445 12 St., S.W. Washington, D.C. 20554

Re: Ex Parte, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CC Docket No. 98-67

Dear Ms. Dortch:

On June 13, 2002, Larry Fenster, Hadi Alsegaf, and Bill McClelland from WorldCom, met with Margaret Egler, Warren O'Hearn, Pam Gregory, Tom Chandler, Janet Sievert, Sean O'More, and Gene Fullano of the Consumer and Governmental Affairs Bureau, and Sharon Webber, Ruthanne Szenasi, and Andy Firth of the Wireline Competition Bureau to discuss methods to prevent Internet Protocol (IP) Relay calls that originate in countries outside of the United States from being terminated outside of the United States, because such calls are not reimbursable under the Commission's telecommunications relay service rules. The attached document was presented at the meeting.

Discussion focused on a combination of technical and administrative controls. The first stage of controls would involve segregating calls that are associated with international domain names and allowing them to be terminated only to locations within the United States and its territories. The second stage of controls would involve segregating calls that are not associated with international domain names and which seek to terminate in locations outside of the United States and its territories. The third stage of controls would require a user who falls into the second category to certify that he or she resides within the United States and its territories in order to complete a call to an international location.

If you have any questions please don't hesitate to contact me.

Sincerely,

Larry Fenster

Larry Fenster 202-736-6513

cc: Margaret Egler, Warren O'Hearn, Pam Gregory, Tom Chandler, Janet Sievert, Sean O'More, Gene Fullano, Sharon Webber, Ruthanne Szenasi, Andy Firth